

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-11314-PBS

ST. PAUL TRAVELERS, as successor in  
interest to ATLANTIC MUTUAL  
INSURANCE CO. Marine Division, subrogee  
of IBEX LLC, and IBEX, LLC

Plaintiffs

v.

FAIRHAVEN SHIPYARD, INC., and A.I.  
MARINE ADJUSTERS, INC., a member of  
AMERICAN INTERNATIONAL GROUP,  
INC.,

Defendants

PARTIES PROPOSED AGENDA FOR  
SCHEDULING CONFERENCE

The parties jointly propose the following schedule for the Scheduling Conference, set  
down for Thursday, October 28, 2004:

- (1) Facts of Case/Background;
- (2) Plaintiffs' Claims Against Fairhaven Shipyard;
- (3) Plaintiffs' Claims Against A.I. Marine Adjusters;
- (4) A.I. Marine Adjusters' Motion to Dismiss;
- (5) Possibility of Prompt Resolution;
- (6) Proposed Discovery Plan;
- (7) Schedule for the Filing of Motions; and

(8) Referral to Magistrate Judge, or alternative dispute resolution.

Respectfully submitted,

Plaintiffs,

ST. PAUL TRAVELERS as successor in  
interest to ATLANTIC MUTUAL  
INSURANCE CO. Marine Division, subrogee  
of IBEX LLC, and IBEX, LLC

By their attorney,

s/ William Hewig, III

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William Hewig, III (BBO# 541910)  
Kopelman and Paige, P.C.  
31 St. James Avenue  
Boston, MA 02116  
(617) 556-0007

Defendant,

A.I. MARINE ADJUSTERS, INC.

By its attorneys,

s/ Robert M. Elmer

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James J. Duane, III Esq. (BBO # 136500)  
Robert M. Elmer, Esq. (BBO #640269)  
Taylor Duane Barton and Gilman, LLP  
111 Devonshire Street  
Boston, MA 02109

Defendant,

FAIRHAVEN SHIPYARD, INC.

By its attorney,

s/ John F. Leahy

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John F. Leahy, Esq. (BBO # 289860)  
Long & Holden  
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